



# Securities Trading

## Group Statement

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## Securities Trading Statement

### 1. Purpose

The BSA Group Securities Trading Statement supports and is supported by the BSA Governance Policy along with Communication and Consultation and Stakeholder Management Standards.

This Statement also leads and is supported by the BSA Group Securities Trading Guide which acts to assist those involved with the trading of securities in relation to their roles, responsibilities and limitations of trading.

This Securities Trading Statement sets out BSA Limited and its subsidiaries ('BSA') requirements regarding the dealing in BSA securities, which includes shares, options, warrants, debentures and any other security on issue from time to time ('BSA Securities'), and which are listed for quotation on the Australian Securities Exchange ('ASX') or other financial market.

### 2. Scope

Compliance with this Group Statement applies to all Directors and Officers (as defined in the Corporations Act, referred to as 'Designated Officers'), their direct reports, and employees of BSA and their Associates.

Designated Officers will, for the purposes of this Statement, also include members of senior management, and all other persons who might reasonably be regarded by BSA as having access to price sensitive or inside information (as determined by the Company Secretary and/or General Counsel).

### 3. Statement

BSA seeks to achieve this purpose in regards to trading by:

- Ensuring Directors and employees recognise that it is illegal to deal in any BSA Securities while in possession of inside information concerning BSA.
- Explaining the types of conduct in dealing in BSA Securities that are prohibited under the Corporations Act 2001 (Cth) ('Corporations Act'). Such prohibitions apply to all Directors and employees of the Company, and its Related Bodies Corporate, as defined in the Corporations Act (collectively the Group); and
- Ensuring best practice procedures and processes for the buying and selling of BSA Securities that protects the Company, Directors, and employees against the misuse of unpublished information which could materially affect the value of BSA Securities.
- Ensuring Directors, Designated Officers and employees are made aware of "Trading Windows" that may create exceptions which are in contravention of the 'Corporations Act'.

It is the responsibility of BSAs Directors, Designated Officers and employees to:

- Ensure notification to the Company Secretary and/or General Counsel of any dealing in BSA Securities giving rise to a notifiable interest;
- Ensure notification of any margin loan and other financing arrangements applies to Designated Officers and their Associates;
- Not to deal in BSA Securities at any time when in possession of inside or price sensitive information.
- Use their best endeavours to ensure, to the extent practicable, that their Associates are made aware of, and understand, this Statement, and any restrictions that it may impose upon them dealing in BSA Securities.

BSA recognises and manages non-compliance by:

- Ensuring that any non-compliance with this statement be regarded as serious misconduct which may entitle BSA to take corrective disciplinary action.
- Ensuring that with regard to Confidential information, all Designated Officers and employees treat all sensitive, non-public information about BSA as confidential and proprietary to BSA which must not be disclosed without the approval of the Board or the Managing Director as appropriate.
- Limiting risk through the prohibition of Designated Officers from dealing in financial products issued or created over BSA Securities by third parties, or dealing in associated products. In addition to the restrictions on margin loans and other financing arrangements set out in the notification of margin loan and other financing arrangements that may apply, Designated Officers may not enter into any other transaction that operates to limit the economic risk of their security holding in BSA.

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